



STATE OF WASHINGTON  
WASHINGTON STATE BOARD OF HEALTH

*PO Box 47990 • Olympia, Washington 98504-7990*

January 30, 2007

Mr. Mark Caverly, Chief  
Office of Diversion Control  
Liaison and Policy Section  
600 Army Navy Drive  
Arlington, VA 22202

Dear Mr. Caverly:

The Washington State Board of Health is writing in support of a waiver request being submitted to your office by the Washington State Board of Pharmacy on behalf of a coalition of state and local governmental agencies and private organizations called PH:ARM (Pharmaceuticals from Households: A Return Mechanism). The PH:ARM coalition seeks a limited waiver from certain federal requirements that allow only law enforcement personnel to receive and accumulate unused controlled substances from consumers. The waiver is being requested to allow a tightly-monitored take-back pilot program to include controlled substances along with other pharmaceuticals. The pilot program would use secure drop-box containers located in selected licensed pharmacies and nursing homes. Items left in the drop boxes would be collected by fully licensed disposal companies for incineration.

The Board supports the efforts of PH:ARM to get unwanted pharmaceuticals out of home medicine cabinets and disposed of in a manner that minimizes potential impacts to the environment and public health. Unwanted household pharmaceuticals present a substantial risk for accidental and intentional poisoning or misuse by children, teens, and others. Under the normal garbage collection system, there is a risk for inappropriate diversion and misuse of discarded pharmaceuticals. Even in wastewater, discarded pharmaceuticals seem to affect the environment and, ultimately, could affect human health. The PH:ARM pilot program hopefully will be able to demonstrate a safe, secure, and efficient way to reduce the amount of unwanted pharmaceuticals in households and residential care facilities.

Please do not hesitate to contact the Board's executive director, Craig McLaughlin, at 360-236-4106 or [craig.mclaughlin@doh.wa.gov](mailto:craig.mclaughlin@doh.wa.gov) if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Treuman Katz".

Treuman Katz, Chair  
Washington State Board of Health

cc: Washington State Board of Health Members  
Mary Selecky, Washington State Department of Health  
Emma Johnson, Washington State Department of Ecology  
Cynthia Todd, Washington State Department of Social and Health Services  
Lisa Salmi, Washington State Department of Health